

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

In re:

Wisconsin & Milwaukee Hotel LLC,

Debtor.

Case No. 24-21743-gmh
Chapter 11

**SEPTEMBER 2024 FEE STATEMENT OF RICHMAN & RICHMAN LLC
AS COUNSEL TO DEBTOR**

Applicant:	Richman & Richman LLC
Counsel for:	Wisconsin & Milwaukee Hotel LLC
Period for compensation and reimbursement:	September 1, 2024 through September 30, 2024
Amount of compensation sought as actual, reasonable, and necessary:	\$13,589.00
Amount of reimbursement expenses sought as actual, reasonable, and necessary:	\$995.70
Total interim approval requested:	\$14,584.70

Dated this 10th day of October 2024.

RICHMAN & RICHMAN
Attorneys for the Debtor

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Richman & Richman LLC

122 W Washington Ave, Suite 850
Madison, WI 53703-2732

INVOICE

Invoice # 1049
Date: 10/10/2024
Due On: 11/09/2024

Wisconsin & Milwaukee Hotel LLC
c/o Jackson Street Management LLC
Attn: Mr. Edward G. Carow
731 N. Jackson Street, Suite 420, Milwaukee WI53202

Wisconsin & Milwaukee Hotel LLC/-2024.00023

Chapter 11

Services

Type	Date	Notes	Timekeeper	Quantity	Rate	Total
Service	09/03/2024	1109 - Asset Analysis & Recovery: Review and prepare all documents produced to lender including White Lodging documents, for review of appraiser LWHA (.8); email exchange with T. Goldblatt at LWHA re: documents for review (.1)	DTF	0.90	\$195.00	\$175.50
Service	09/03/2024	1112 - Debtor Meetings & Communications: Weekly client team mtg, incl. J. Cordova and D. Friedland	MPR	0.70	\$750.00	\$525.00
Service	09/03/2024	1104 - DIP Financing / Cash Collateral: zoom meeting w/D. Friedland and J. Cordova re budget questions	MPR	0.20	\$750.00	\$150.00
Service	09/03/2024	1102 - Case Administration / US Trustee: review query from V. Morelli re increased AP and AR in April, and prep of response after emails w/J. Cordova and D. Friedland	MPR	0.20	\$750.00	\$150.00
Service	09/03/2024	1108 - Employment, Billing & Compensation: work on Sikich employment app	MPR	0.10	\$750.00	\$75.00
Service	09/04/2024	1108 - Employment, Billing & Compensation: Work on Sikich employment app (.3); email w/J. Cordova re Sikich questions (.1)	MPR	0.40	\$750.00	\$300.00
Service	09/04/2024	1108 - Employment, Billing & Compensation: Prepare revisions to current drafts of Application to Employ Sikich as Accountant for WMH and Declaration of	EMR	0.80	\$450.00	\$360.00

		Gerald Schmit in support of same (.7); prepare email to Jennifer Maldonado forwarding same for her review (.1).				
Service	09/05/2024	1108 - Employment, Billing & Compensation: Prepare email to Jennifer Cordova and Erin Horman at Sikich providing Application to Employ Sikich pleadings for review and signatures for filing.	EMR	0.30	\$450.00	\$135.00
Service	09/05/2024	1108 - Employment, Billing & Compensation: Continue preparing application to employ ICAP as financial advisor/auditor.	EMR	0.70	\$450.00	\$315.00
Service	09/05/2024	1108 - Employment, Billing & Compensation: Prepare proposed order granting Application to Employ LWHA as appraiser for WMH.	EMR	0.50	\$450.00	\$225.00
Service	09/05/2024	1109 - Asset Analysis & Recovery: Emails w/D. Friedland re scope of asset mgmt. work to be done	MPR	0.10	\$750.00	\$75.00
Service	09/06/2024	1108 - Employment, Billing & Compensation: Finalize application to employ Sikich LLC as accountants with declaration and exhibits and prepare for court filing	DTF	0.40	\$195.00	\$78.00
Service	09/06/2024	1108 - Employment, Billing & Compensation: Prepare preliminary draft of August 2024 monthly invoice statement pursuant to alternative compensation procedures order	DTF	0.20	\$195.00	\$39.00
Service	09/06/2024	1108 - Employment, Billing & Compensation: Prep of email to J. Jaeger re court approval and related email to WL re payment expected	MPR	0.10	\$750.00	\$75.00
Service	09/06/2024	1108 - Employment, Billing & Compensation: Finalize Application to Employ Sikich LLC as accountants for WMH, including receiving and reviewing email from Erin Horman at Sikich regarding revisions to Application and revised versions (.4); phone conference with Erin Horman to discuss revisions (.2); and receiving and reviewing final version of Declaration for filing with Application (.2).	EMR	0.80	\$450.00	\$360.00
Service	09/09/2024	1108 - Employment, Billing & Compensation: Revise and update draft August 2024 R&R monthly invoice statement pursuant to alternative	DTF	0.20	\$195.00	\$39.00

		compensation procedures order (.1); prepare draft proposed order of August 2024 monthly invoice statement (.1)				
Service	09/09/2024	1108 - Employment, Billing & Compensation: Continue preparing Application to Employ ICAP Development LLC as accountant for WMH (.5); prepare email to MPR and Jennifer Cordova forwarding same for their review (.1)	EMR	0.60	\$450.00	\$270.00
Service	09/10/2024	1108 - Employment, Billing & Compensation: Finalize August 2024 R&R monthly fee statement with invoice and prepare for court filing	DTF	0.20	\$195.00	\$39.00
Service	09/10/2024	1109 - Asset Analysis & Recovery: Prepare sharefile of documents produced to lenders for review of additional LWHA appraiser	DTF	0.20	\$195.00	\$39.00
Service	09/10/2024	1108 - Employment, Billing & Compensation: Continue review of file and invoices and revise and update draft first interim fee application	DTF	1.80	\$195.00	\$351.00
Service	09/10/2024	1110 - Claim Management Issues: Prepare Objection to Proof of Claims.	YXC	3.00	\$195.00	\$585.00
Service	09/11/2024	1108 - Employment, Billing & Compensation: Continue review of all invoices and draft first interim R&R fee application with preparation of exhibits	DTF	3.80	\$195.00	\$741.00
Service	09/11/2024	1110 - Claim Management Issues: Prepare Objection to Proof of Claims.	YXC	6.00	\$0.00	\$0.00
Service	09/11/2024	1108 - Employment, Billing & Compensation: Work on app to employ ICAP Development, and dec in support	MPR	0.30	\$750.00	\$225.00
Service	09/11/2024	1112 - Debtor Meetings & Communications: prep of agenda for team strategy call on 9/12/24	MPR	0.10	\$750.00	\$75.00
Service	09/11/2024	1108 - Employment, Billing & Compensation: Continue preparing Application to Employ ICAP Development LLC as accountant to WMH.	EMR	0.80	\$450.00	\$360.00
Service	09/12/2024	1108 - Employment, Billing & Compensation: Continue drafting first interim R&R fee application with preparation of exhibits	DTF	2.80	\$195.00	\$546.00
Service	09/12/2024	1112 - Debtor Meetings & Communications: Team status/strategy meeting by Zoom	MPR	0.30	\$750.00	\$225.00

Service	09/12/2024	1108 - Employment, Billing & Compensation: Prepare email to Shaun Geracie and Jennifer Maldonado forwarding final versions of Application to Employ ICAP Development LLC as accountant for WMH (.2); conduct email exchange with Shaun Geracie to address his questions regarding the Application and Declaration to file same (.3); conduct email exchange with Shaun Geracie and Jennifer Cordova to confirm ICAP's fee (.2).	EMR	0.70	\$450.00	\$315.00
Service	09/13/2024	1109 - Asset Analysis & Recovery: Review email from LWHA appraiser with request for additional documents and information, and review file for all available documentation responsive to request (.6); email exchange and review with client re: information and available documentation (.2); prepare all documentation and provide detailed information via email and sharefile link to appraiser (.7)	DTF	1.50	\$195.00	\$292.50
Service	09/13/2024	1110 - Claim Management Issues: Review emails between J Cordova and YXC to ascertain claims filed by Mariott, and review filed claims to confirm objections	CAR	0.40	\$575.00	\$230.00
Service	09/13/2024	1108 - Employment, Billing & Compensation: Prepare email to Shaun Geracie and Jennifer Cordova advising of filing of Application to Employ ICAP Development and effect of same.	EMR	0.10	\$450.00	\$45.00
Service	09/13/2024	1110 - Claim Management Issues: Review and revise draft of proposed email to Jennifer Cordova requesting information on White Lodging's proof of claim.	EMR	0.20	\$450.00	\$90.00
Service	09/18/2024	1108 - Employment, Billing & Compensation: Prepare itemization of expenses for the fee period and additional review of supporting documents for exhibits in support of finalizing first interim fee application	DTF	0.70	\$195.00	\$136.50
Service	09/18/2024	1109 - Asset Analysis & Recovery: Review client's email with updated monthly star report for review of LWHA appraiser and provide updated documentation to appraiser via email	DTF	0.20	\$195.00	\$39.00
Service	09/18/2024	1110 - Claim Management Issues: Prepare objection to proof of claim.	YXC	3.30	\$0.00	\$0.00
Service	09/18/2024	1108 - Employment, Billing & Compensation: Work on first interim fee	MPR	0.30	\$750.00	\$225.00

app						
Service	09/18/2024	1104 - DIP Financing / Cash Collateral: prep of email to F. DiCastrì re emergency replacement of broken window shades and purchase of furniture for dining room	MPR	0.10	\$750.00	\$75.00
Service	09/18/2024	1108 - Employment, Billing & Compensation: Prepare revisions to draft of Richman & Richman LLC's first interim fee application.	EMR	3.50	\$450.00	\$1,575.00
Service	09/18/2024	1108 - Employment, Billing & Compensation: Continue preparing Richman & Richman LLC's first interim fee application.	EMR	0.80	\$450.00	\$360.00
Service	09/19/2024	1108 - Employment, Billing & Compensation: Prepare proposed order granting Application to Employ Sikich LLC as accountants for WMH.	EMR	0.40	\$450.00	\$180.00
Service	09/20/2024	1108 - Employment, Billing & Compensation: Prepare proposed order approving Richman & Richman LLC's monthly fee request for August 2024.	EMR	0.20	\$450.00	\$90.00
Service	09/20/2024	1108 - Employment, Billing & Compensation: Continue preparing Richman & Richman's first interim fee application.	EMR	1.00	\$450.00	\$450.00
Service	09/23/2024	1103 - Petition, Schedules & Financials: Finalize August 2024 monthly operating report with supporting documentation for court filing	DTF	0.30	\$195.00	\$58.50
Service	09/23/2024	1102 - Case Administration / US Trustee: Conduct review of August 2024 MOR to finalize same.	EMR	0.20	\$450.00	\$90.00
Service	09/24/2024	1112 - Debtor Meetings & Communications: prep of agenda for team zoom mtg (.1);team strategy/zoom meeting (.5)	MPR	0.60	\$750.00	\$450.00
Service	09/24/2024	1104 - DIP Financing / Cash Collateral: prep of email to F. DiCastrì re budget and emergency repairs	MPR	0.10	\$750.00	\$75.00
Service	09/25/2024	1104 - DIP Financing / Cash Collateral: email exchanges w/F. DiCastrì re Lender Qs about MOR distribution reports and other pending matters	MPR	0.10	\$750.00	\$75.00
Service	09/26/2024	1108 - Employment, Billing & Compensation: Review proposed engagement agreement between Lennhoff	EMR	1.00	\$450.00	\$450.00

Real Estate Consulting and WMH (.2); phone conference with David Lennhoff to discuss employment process (.2); prepare email to David Lennhoff providing information for conflicts check (.2); begin preparing Application to Employ Lennhoff Real Estate Consulting (.4).

Service	09/26/2024	1108 - Employment, Billing & Compensation: Continue preparing Richman & Richman LLC's first interim fee application.	EMR	1.50	\$450.00	\$675.00
Service	09/27/2024	1108 - Employment, Billing & Compensation: Conduct email exchange with David Lennhoff regarding results of his conflict check for purposes of Application to Employ Lennhoff Real Estate Consulting as appraiser/expert witness for WMH.	EMR	0.20	\$450.00	\$90.00
Service	09/30/2024	1108 - Employment, Billing & Compensation: Conduct email exchange with Jennifer Cordova and Shaun Geracie for ICAP advising of status of Application, including no objections filed as to same (.2); prepare proposed order granting Application to Employ ICAP Development LLC as Accountant for WMH (.5).	EMR	0.70	\$450.00	\$315.00
Service	09/30/2024	1108 - Employment, Billing & Compensation: Prepare Application to Employ Lennhoff Real Estate Consulting LLC as expert witness for WMH and Declaration of David Lennhoff in support of Application (1.4); prepare email to Attorneys Karnes, Strohhahn, and Richman forwarding same for their review (.1).	EMR	1.50	\$450.00	\$675.00
Quantity Subtotal						46.1
Services Subtotal						\$13,589.00

Expenses

Type	Date	Notes	Quantity	Rate	Total
Expense	08/14/2024	Copy Expense: Stretto Printing/Copying Expense: Application of the Debtor for Authority to Retain and Employ LW Hospitality Advisors as Appraiser (Doc 224) and Notice of Application of the Debtor for Authority to Retain and Employ LW Hospitality Advisors as Appraiser (Doc 225)	1.00	\$727.65	\$727.65
Expense	08/14/2024	Postage Expense: Stretto Postage Expense: Application of the Debtor for Authority to Retain and Employ LW Hospitality Advisors as Appraiser (Doc 224)	1.00	\$268.05	\$268.05

and Notice of Application of the Debtor for Authority to
Retain and Employ LW Hospitality Advisors as
Appraiser (Doc 225)

Expenses Subtotal \$995.70

Time Keeper	Position	Quantity	Rate	Total
Eliza Reyes	Associate	16.5	\$450.00	\$7,425.00
Claire Richman	Partner	0.4	\$575.00	\$230.00
Michael Richman	Partner	3.7	\$750.00	\$2,775.00
Yabing Chong	Law Clerk	3.0	\$195.00	\$585.00
Yabing Chong	Law Clerk	9.3	\$0.00	\$0.00
David Fowle	Paralegal	13.2	\$195.00	\$2,574.00

Quantity Total 46.1

Subtotal \$14,584.70

Total \$14,584.70